

REMARKS/ARGUMENTS

Claims 29-54 stand in the present application, claims 41-45 having been amended. Reconsideration and favorable action is requested in view of the above amendments and the following remarks.

In the Office Action, the Examiner has objected to claims 41-54 because the limitation data store generator apparatus is not clearly defined in Applicant's specification. As noted above, Applicant has amended claims 41-45 to replace the term "data store generation apparatus" with "data store generating apparatus." Support for this terminology is believed to be present in the application at the Abstract and *inter alia*, at Figure 1 and page 9, lines 5-14. Accordingly, the Examiner's objection to the claims is believed to have been overcome.

The Examiner has rejected claims 29-30 and 41-42 under 35 U.S.C. § 102(b) as being anticipated by Kraay et al. ("Kraay"). Applicant respectfully traverses the Examiner's § 102 rejection of the claims.

The Kraay method works essentially by comparing the contents of two databases, a "connection database" (12) which contains connection information pertaining to a subscriber having a network address, and a "surveillance database" (14) which contains information about suspicious network addresses. The result of this comparison is a list of telephone numbers which appear on both databases (12) and (14). See Kraay at column 4, line 66 to column 5, line 4. The result is then used to cluster network addresses associated with subscribers who have communicated with

each other. A "distance" between such addresses is calculated, and then plotted and displayed. See Kraay at column 5, line 5 to column 6, line 19.

The Examiner alleges that generating the "records" of the present claims is taught by the creation of the "files" in Kraay which contain telephone numbers obtained from database (12). In Kraay, the same set of telephone numbers are stored in two such "files" – where in one "file" they are sorted in numerical order and in a second "file" by frequency of occurrence. However, in independent claims 29 and 41 of the present application each record "pertains to a respective one of a plurality of users." Thus, the Kraay telephone number "files" – being a list of ordered telephone numbers – do not pertain to a specific subscriber, as required by the present claims.

The Kraay "files" also do not take a format which includes a required second field or a required third field. Even if there is data relating to a second user in the form of a call connection record, this is not held in within the "files" in the specific format claimed. In Applicant's invention, as required by the present claims, the third field of the present application is capable of holding data identifying another record – in Kraay, neither of the two "files" take a form which includes a field which refers to the other. As noted above, each file simply lists telephone numbers ordered in particular manner.

In short, even if types of data in Kraay may be found to correspond to types of data in the present application, the records format required by the present claims is not disclosed nor suggested in Kraay. The Kraay "files" simply do not fit the description of the required records of the present claims, nor does any other disclosed feature in Kraay. This is understandable, as Kraay is directed to a completely different problem

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from that addressed by the present application and seeks to solve the problem in a completely different way.

Accordingly, independent claims 29 and 41 and their respective dependent claims are believed to patentably define over the cited reference.

The Examiner has also rejected dependent claims 21-40 and 43-54 over various combinations of Kraay in view of secondary references De l'Etraz et al., and Kolluri et al. Applicant respectfully traverses the Examiner's § 103 rejection of the claims.

Since the secondary references of De l'Etraz and Kolluri do not solve the deficiencies noted above with respect to Kraay, it is respectfully submitted that these claims also patentably define over the cited references taken either singly or in any combination.

Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 29-54, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining that this Examiner believes can be resolved with either a Supplemental Response or Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

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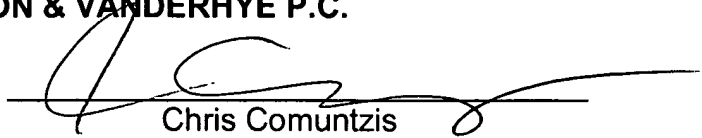
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Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____


Chris Comuntzis
Reg. No. 31,097

CC:Imr

901 North Glebe Road, 11th Floor

Arlington, VA 22203-1808

Telephone: (703) 816-4000

Facsimile: (703) 816-4100